

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

KHRISTINE MARIE CAMPBELL
1107 Fair Oaks Ave Apt 286
S. Pasadena, CA 91030

Registered Nurse License No. 613041

Respondent.

Case No. 2008-23

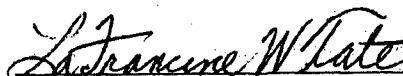
OAH No. L-2007110166

DECISION

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on September 4, 2008.

IT IS SO ORDERED September 4, 2008



President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 MARC D. GREENBAUM
Supervising Deputy Attorney General
3 ANNE HUNTER, State Bar No. 136982
Deputy Attorney General
4 300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
5 Telephone: (213) 897-2114
Facsimile: (213) 897-2804
6

7 Attorneys for Complainant
8

9 **BEFORE THE**
10 **BOARD OF REGISTERED NURSING**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

14 KHRISTINE MARIE CAMPBELL
1107 Fair Oaks Ave., Apt. 286
So. Pasadena, CA 91030
15 Registered Nurse License No. 613041

16 Respondent.

Case No. 2008-23

OAH No. L- 2007110166

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

17
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
19 proceeding that the following matters are true:

20 **PARTIES**

21 1. Complainant Ruth Ann Terry, M.P.H, R.N, is the Executive Director of
22 the Board of Registered Nursing. She brought this action solely in her official capacity and is
23 represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California,
24 by Anne Hunter, Deputy Attorney General.

25 2. Respondent Khristine Marie Campbell is represented in this proceeding by
26 attorney Keith Landrum, whose address is Landrum & Amponsah, a Law Partnership, 5120 West
27 Goldleaf Circle, Suite 230, Los Angeles, CA 90056.

28 3. On or about February 3, 2003, the Board of Registered Nursing issued

1 Registered Nurse License No. 613041 to respondent. The license was in full force and effect at
2 all times relevant to the charges brought in Accusation No. 2008-23 and will expire on October
3 31, 2008, unless renewed.

4 JURISDICTION

5 4. Accusation No. 2008-23 was filed before the Board of Registered Nursing,
6 and is currently pending against respondent. The accusation and all other statutorily required
7 documents were properly served on respondent on July 25, 2007. Respondent timely filed her
8 Notice of Defense contesting the accusation. A copy of Accusation No. 2008-23 is attached as
9 exhibit A and incorporated herein by reference.

10 ADVISEMENT AND WAIVERS

11 5. Respondent has carefully read, fully discussed with counsel, and
12 understands the charges and allegations in Accusation No. 2008-23. Respondent also has
13 carefully read, fully discussed with counsel, and understands the effects of this Stipulated
14 Surrender of License and Order.

15 6. Respondent is fully aware of her legal rights in this matter, including the
16 right to a hearing on the charges and allegations in the accusation; the right to be represented by
17 counsel, at her own expense; the right to confront and cross-examine the witnesses against her;
18 the right to present evidence and to testify on her own behalf; the right to the issuance of
19 subpoenas to compel the attendance of witnesses and the production of documents; the right to
20 reconsideration and court review of an adverse decision; and all other rights accorded by the
21 California Administrative Procedure Act and other applicable laws.

22 7. Respondent voluntarily, knowingly, and intelligently waives and gives up
23 each and every right set forth above.

24 CULPABILITY

25 8. Respondent understands and agrees that the charges and allegations in
26 Accusation No. 2008-23, if proven at a hearing, constitute cause for imposing discipline upon
27 her Registered Nurse License No. 613041.

28 9. For the purpose of resolving Accusation No. 2008-23 without the expense

1 and uncertainty of further proceedings, respondent agrees that, at a hearing, complainant could
2 establish a factual basis for the charges in Accusation No. 2008-23 and that those charges
3 constitute cause for discipline. Respondent hereby gives up her right to contest those charges.

4 10. Respondent understands that by signing this stipulation she enables the
5 Board to issue an order accepting the surrender of her Registered Nurse License without further
6 process.

7 RESERVATION

8 11. The admissions made by respondent herein are only for the purposes of
9 this proceeding, or any other proceedings in which the Board of Registered Nursing or other
10 professional licensing agency is involved, and shall not be admissible in any other criminal or
11 civil proceeding.

12 CONTINGENCY

13 12. This stipulation shall be subject to approval by the Board of Registered
14 Nursing. Respondent understands and agrees that counsel for complainant and the staff of the
15 Board of Registered Nursing may communicate directly with the Board regarding this stipulation
16 and surrender, without notice to or participation by respondent. By signing the stipulation,
17 respondent understands and agrees that she may not withdraw her agreement or seek to rescind
18 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt
19 this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall
20 be of no force or effect; except for this paragraph, it shall be inadmissible in any legal action
21 between the parties, and the Board shall not be disqualified from further action by having
22 considered this matter.

23 13. The parties understand and agree that facsimile copies of this Stipulated
24 Surrender of License and Order, including facsimile signatures thereto, shall have the same force
25 and effect as the originals.

26 14. In consideration of the foregoing admissions and stipulations, the parties
27 agree that the Board of Registered Nursing may, without further notice or formal proceeding,
28 issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 613041 issued to respondent Khristine Marie Campbell is surrendered and accepted by the Board of Registered Nursing.

1. The surrender of respondent's Registered Nurse License No. 613041 and the acceptance of the surrendered license by the Board of Registered Nursing shall constitute the imposition of discipline against respondent. This stipulation constitutes a record of the discipline and shall become a part of respondent's license history with the Board of Registered Nursing.

2. Respondent shall lose all rights and privileges as a registered nurse in California as of the effective date of the Board's Decision and Order.

3. Respondent shall cause to be delivered to the Board both her pocket license and wall certificate on or before the effective date of the Decision and Order.

4. Respondent fully understands and agrees that if she ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 2008-23 shall be deemed to be true, correct and admitted by respondent when the Board determines whether to grant or deny the petition.

5. Respondent shall not apply for licensure or petition for reinstatement for two (2) years from the effective date of the Board's Decision and Order.

6. The Board has decided to waive recovery of the costs of investigation and enforcement in this matter.

\\

\\

\\


\\

\\

ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney, Keith Landrum, D.P.M., J.D. I understand the stipulation and the effect it will have on my Registered Nurse License No. 613041. I enter into this Stipulated Surrender of License and Order voluntarily; knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: March 24, 2008.



Khristine Marie Campbell
Respondent

I have read and fully discussed with Respondent Khristine Marie Campbell the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: March 24, 2008.

LANDRUM & AMPONSAH,
A Law Partnership



KEITH LANDRUM, D.P.M., J.D.
Attorney for Respondent

\\

\\

\\

\\

\\

\\

\\

\\

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Registered Nursing.

DATED: March 24, 2008.

EDMUND G. BROWN JR., Attorney General
of the State of California

MARC D. GREENBAUM
Supervising Deputy Attorney General



ANNE HUNTER
Deputy Attorney General

Attorneys for Complainant

DOJ Matter ID: LA2007600504
60263522.wpd

Exhibit A
Accusation No. 2008-23

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 MARC D. GREENBAUM,
Supervising Deputy Attorney General
3 ANNE HUNTER, State Bar No. 136982
Deputy Attorney General
4 California Department of Justice
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-2114
6 Facsimile: (213) 897-2804

7 Attorneys for Complainant

8
9 **BEFORE THE**
10 **BOARD OF REGISTERED NURSING**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
12 **STATE OF CALIFORNIA**

13 In the Matter of the Penal Code Section 23
Against:

14 KHRISTINE MARIE CAMPBELL
1107 Fair Oaks Ave., Apt. 286
15 So. Pasadena, CA 91030

16 Registered Nurse License No. 613041

17 Respondent.

Case No. 2008-23

OAH No. BA 209425

A C C U S A T I O N

18
19 Complainant alleges:

20 **PARTIES**

21 1. Complainant Ruth Ann Terry, M.P.H, R.N brings this accusation solely in
22 her official capacity as the Executive Officer of the Board of Registered Nursing (Board).

23 2. On or about February 3, 2003, the Board issued Registered Nurse License
24 Number 613041 to respondent Khristine Marie Campbell. The Registered Nurse License was in
25 full force and effect at all times relevant to the charges brought herein and will expire on October
26 31, 2008, unless renewed.

27 **JURISDICTION**

28 3. This accusation is brought before the Board of Registered Nursing,

1 Department of Consumer Affairs, State of California, under the authority of the following laws.
2 All section references are to the Business and Professions Code unless otherwise indicated.

3 4. Section 2750 of the Business and Professions Code ("Code") provides, in
4 pertinent part, that the Board may discipline any licensee, including a licensee holding a
5 temporary or an inactive license, for any reason provided in Article 3 (commencing with section
6 2750) of the Nursing Practice Act.

7 5. Section 2764 of the Code provides, in pertinent part, that the expiration of
8 a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding
9 against the licensee or to render a decision imposing discipline on the license.

10 6. Section 118, subdivision (b), of the Code provides that the suspension,
11 expiration, surrender, or cancellation of a license shall not deprive the Board of jurisdiction to
12 proceed with a disciplinary action during the period within which the license may be renewed,
13 restored, reissued or reinstated.

14 7. Section 2746.8 of the Code provides that a license that has expired
15 because of non-renewal may be reinstated within a period of eight years thereafter if certain
16 conditions are met.

17 8. Section 2761 of the Code states:

18 "The board may take disciplinary action against a certified or licensed nurse or
19 deny an application for a certificate or license for any of the following:

20 "(a) Unprofessional conduct,

21 "

22 "(d) Violating or attempting to violate, directly or indirectly, or assisting in or
23 abetting the violating of, or conspiring to violate any provision or term of this chapter [the
24 Nursing Practice Act] or regulations adopted pursuant to it.

25 "

26 "(f) Conviction of a felony or of any offense substantially related to the
27 qualifications, functions, and duties of a registered nurse, in which event the record of the
28 conviction shall be conclusive evidence thereof.

1 9. Title 16, California Code of Regulations, section 1444 provides in
2 pertinent part:

3 “A conviction or act shall be considered to be substantially related to the qualifications,
4 functions or duties of a registered nurse if to a substantial degree it evidences the present or
5 potential unfitness of a registered nurse to practice in a manner consistent with the public health,
6 safety, or welfare. Such convictions or acts shall include but not be limited to the following:

7 “(a) Assaultive or abusive conduct

8 “

9 “(c) Theft, dishonesty, fraud, or deceit.”

10 10. Code section 2765 states:

11 “A plea or verdict of guilty or a conviction following a plea of nolo contendere made to a
12 charge substantially related to the qualifications, functions and duties of a registered nurse is
13 deemed to be a conviction within the meaning of this article. The board may order the license or
14 certificate suspended or revoked, or may decline to issue a license or certificate, when the time
15 for appeal has elapsed, or the judgment of conviction has been affirmed on appeal or when an
16 order granting probation is made suspending the imposition of sentence, irrespective of a
17 subsequent order under the provisions of Section 1203.4 of the Penal Code allowing such a
18 person to withdraw his or her plea of guilty and to enter a plea of not guilty, or setting aside the
19 verdict of guilty, or dismissing the accusation, information or indictment.”

20 11. Code section 125.3 provides, in pertinent part, that the Board may request
21 the administrative law judge to direct a licentiate found to have committed a violation or
22 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
23 and enforcement of the case.

24 **FIRST CAUSE FOR DISCIPLINE**

25 **(Conviction of Felony Related To Nursing Duties, Functions or Qualifications)**

26 12. Respondent is subject to disciplinary action under section 2761,
27 subdivision (f), in conjunction with title 16, California Code of Regulations section 1444,
28 because she committed crimes substantially related to the qualifications, functions, and duties of

1 a registered nurse. On April 25, 2007, in a criminal proceeding entitled *The People of the State*
2 *of California v. Khristine Marie Campbell*, Los Angeles County Superior Court, Case No.
3 BA289425, respondent was convicted of a felony on her plea of *nolo contendere* to violating
4 Penal Code section 532, subdivision (a) (making false statements on financial records). The
5 circumstances of the conviction are as follows:

6 13. In June 2003, while on duty as a registered nurse at Cedar Sinai Hospital
7 in Los Angeles, respondent met Lynn S., a woman over 80 years old who had been hospitalized
8 for a broken hip.¹ After Lynn S. was discharged from the hospital, respondent gained access to
9 her home, mail and bank accounts. On or between August 1, 2003, and November 18, 2004,
10 respondent wrote and/or signed 30 checks totaling \$45,327.00 on Lynn S.'s checking account.
11 Six of the checks made payable to cash and five of the checks made payable to respondent were
12 deposited in two different bank accounts belonging to respondent.

13 14. Respondent learned that Lynn S. had a life insurance policy with Hartford
14 Life Insurance Company. In September 2003 the company was asked to provide a statement of
15 the policy. In June 2004, Lynn S. "authorized" the company to speak with her "niece Christine
16 Campbell" about the policy. On August 9, 2004, the company wrote Lynn S. a check for
17 \$40,000.00. Funds from the check which were deposited into Lynn S.'s bank account on August
18 10, 2004, later turned up missing..

19 15. On or about September 10, 2004, respondent took Lynn S. with her to a
20 title company and had Lynn S.'s signature notarized on two trust deeds. Lynn S. thought that she
21 was acting as a witness for respondent. She did not understand that her signature obligated her to
22 purchase property in joint tenancy with respondent.

23 16. On or about November 15, 2004, Lynn S. went to her bank to withdraw
24 money and discovered some \$30,000.00 was missing from her account. The theft was reported
25 to the police, and respondent was arrested on September 22, 2005. On March 7, 2006,
26

27 1. The victim is identified solely by initials to protect her privacy; her full name is known
28 to respondent.

1 respondent was charged with three felony counts of stealing the property of an elder and
2 dependent adult in violation of Penal Code section 368, subdivision (d). On April 25, 2007, in
3 the matter entitled *People v. Khristine Marie Campbell*, Los Angeles County Superior Court
4 Case No. BA289425, respondent pled nolo contendere to an added felony count of making false
5 financial statements, a violation of Penal Code section 532, subdivision (a). One of the
6 conditions of her plea agreement was restitution of \$50,000.00 for Lynn S.'s estate.

7 **SECOND CAUSE FOR DISCIPLINE**

8 **(Unprofessional Conduct)**

9 17. Respondent is subject to disciplinary action under section 2761,
10 subdivision (a) (unprofessional conduct), because on April 25, 2007, she was convicted by her
11 plea of nolo contendere to one felony count of violating Penal Code section 532, subdivision (a)
12 (making false statements on financial records). The circumstances are set forth more fully in
13 paragraphs 11 through 16 above and incorporated herein by reference.

14 **THIRD CAUSE FOR DISCIPLINE**

15 **(Conspiring or Attempting To Violate Nurse Practice Act)**

16 18. Respondent is subject to disciplinary action under section 2761,
17 subdivision (d), because she abused an elderly and dependent adult as set forth more fully in
18 paragraphs 11 through 16 above and incorporated herein by reference.

19
20 **PRAYER**

21 WHEREFORE, complainant requests that a hearing be held on the matters herein
22 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 23 1. Revoking or suspending Registered Nurse License Number 613041, issued
24 to Khristine Marie Campbell.
25 2. Ordering Khristine Marie Campbell to pay the Board the reasonable costs

26 \\\

27 \\\

28 \\\

1 of the investigation and enforcement of this case, pursuant to Business and Professions Code
2 section 125.3; and

3 3. Taking such other and further action as deemed necessary and proper.

4
5 DATED: 7/24/2007

6
7 Ellen Hochberg for
8 RUTH ANN TERRY, M.P.H., R.N.
9 Executive Officer
10 Board of Registered Nursing
11 State of California
12 Complainant

13 LA2007600504

14 60229640_1.wpd